

IEPA Number: 1558010001

Facility Name: Jones & Laughlin Steel Corp Hennepin Works (LTU Steel)

Street: ST RTE 71

City: Heanepin

County: Putnam

Telephone: 815/925-2133

State: IL Zip Code: 61320

Type of Facility: Notified As: Gen. 079, S02 Regulated As: Gen. S02, 079
LDF? yes ☒ no ☐ HPV? yes ☐ no ☒ 90 Day Follow-up Required? yes ☐ no ☒

Region: 1 Date of Inspection: 05/13/87 From: 9:30am to 12:25pm
Weather (LDF Only): Sunny 75°F

Type of Inspection

ISS: ☒ Sampling: ☐ Citizen Complaint: ☐ Closed: ☐ Withdrawal: ☐
Record Review: ☐ Follow-up to Inspection of : ☐ Other: ☐

Non Regulated Status

Non Regulated Status
Small Quant. Gen.: Claimed Nonhandler: Other (Specify in narrative):

Notified As/Regulated As Matrix Number: 39 Key Letter: E

Notification date, 08/18/80, from initial ✓ or subsequent notification.

Part A date, 11/07/80, from initial ☒ or amended ☐ Part A.

Part B permit application submitted? yes no X

Has the firm been referred to: USEPA? yes ___ no ☒; IAG? yes ___ no ☒; County
States Attorney? yes ___ no ☒. Date of referral to USEPA: _____,
IAG: _____, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____

(CACO)-USEPA COMPLIANCE ORDER ISSUED!

(CACO)-USEPA COMPLIANCE ORDER ISSUED: _____
(CAFO)-USEPA FINAL Order Issued: _____ Illinois PCB Order Issued: _____

TSD Facility Activity Summary

[illegible]

Operator: LTV Steel Co Telephone #: 216/622-5000

Street: 25 Prospect Avenue NW

City: Cleveland State: OH Zip Code: 44115

Owner: LTV Steel Co Telephone #: 216/622-5000

Street: 25 Prospect Avenue NW

City: Cleveland State: OH Zip Code: 44115

Person Interviewed

Paul Schlingman

Title

General Supervisor Telephone # 815/925-2133

Combustion
+ Utilities

Inspection Participants

David S. Retzlaff

Agency/Title

IEPA/EPSTIII

Telephone #

815/987-7404

Prepared By

David S. Retzlaff

Agency/Title

IEPA/EPSTIII

Telephone #

815/987-7404

Summary of Apparent Violations

Area	Class	Section
OTH	I	703.152a2
OTH	I	703.155d
OTH	II	722.141g
OTH	II	725.153b

Area	Class	Section

Area	Class	Section

WASTE DISPOSITION FORM

Facility Name: Jones & Laughlin Steel Corp. Hennepin Works USEPA #: IL0000781591 IEPA #: 1558010001
(LTV STEEL)

(LTV STEEL)												
Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700 -12 *	On 3510 -3 *	On Annual Rpt For	Amount On Site	Rate of Generation	Last Manifested Shipment	Disposition		
1) Waste Pickle Liquor	Pickle Line	5/87	K062	**	Yes	Yes	Yes	Yes	94,500 gallons	30,000 GPD 5-5 1/2 days	11/26/86 ***	On site disposal in injection well.
2) Chromic Acid Waste	Galvanized line *											
* Chromic Acid waste is mixed with waste Pickle Liquor as it is generated. The waste pickle liquor is 99% of total hazardous waste generated. Chromic acid is 1%. Waste analysis is done weekly.												
** Hazardous Waste Notification Form 8700-12 could not be located in the Region File or in LTV Steel's R6												
*** The waste Pickle liquor is occasionally sold as a product for its high iron and hydrochloric acid content. A number of shipments went off-site during the injection well workover in November 1986.												
3) wastewater Treatment Sludge	WWT Plant		non-hazardous									on-site disposal

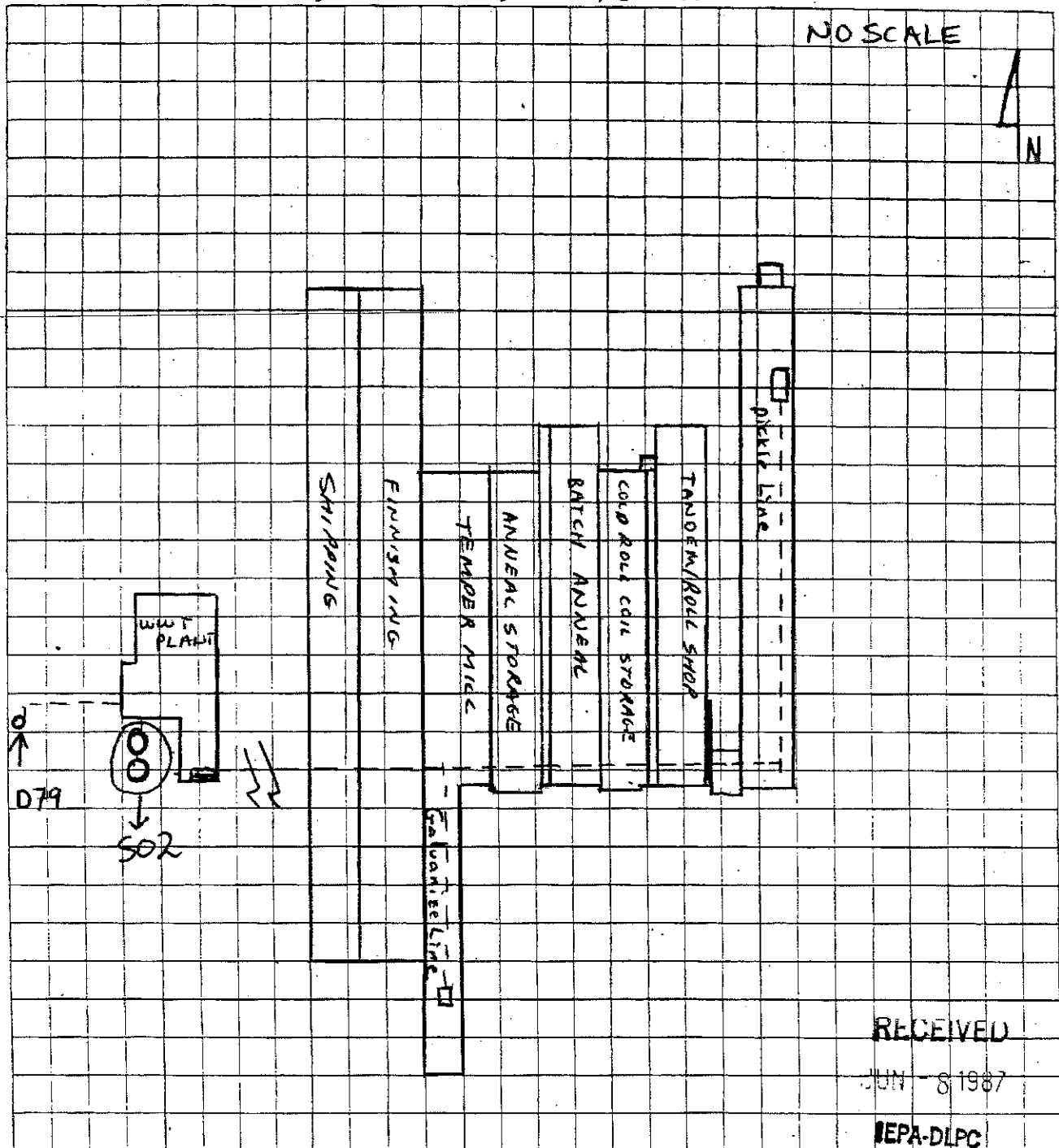
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* All "no" responses must be explained in the narrative

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: 05/13/87 Inspector: David S. Retzlaff
Site Code: 1558010001 County: Putnam
Site Name: Jones & Laughlin Steel Corp. Hennepin Works Time: 9:30am-12:25pm
(LTV Steel) ILD000781591



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STATE ROUTE 71

NARRATIVE

Jones and Laughlin Steel Corporation - Hennepin Works (LTV Steel) is in the business of cold rolling, pickling and galvanizing sheet steel.

The first waste (see waste disposition form), Waste Pickle Liquor is generated from the Pickle Line. Hydrochloric acid is used to remove rust and scale from coiled steel. Approximately 30,000 gallons of the waste hydrochloric acid (Pickle Liquor) is generated per day. The line operates 5-5½ days per week. The Waste Pickle Liquor is pumped to one of two 150,000 gallon rubber-lined steel tanks, which are located at the waste treatment building.

Occasionally, the Waste Pickle Liquor can be sold (depending on market conditions) in order to reclaim hydrochloric acid and iron. The Pickle Liquor can also be used as a primary flocculant in wastewater treatment.

This waste stream comprises approximately 99% of the total hazardous waste generated.

The second waste is chromic acid waste. It is generated from the Galvanized Line. This waste is piped to the storage tanks in the same transmission line as the Waste Pickle Liquor. This waste is approximately 1% of the total hazardous waste generated. Approximately 300 gallons of waste chromic acid is generated per day.

As stated above, these two wastes are stored in two 150,000 gallon rubber lined steel tanks. These steel tanks sit in a cement containment area.

The waste is disposed on site in an injection well. Injection occurs on weekends. A permit for the Class I well is due to be issued in 1987.

The third waste is a non-hazardous wastewater treatment sludge. The sludge is disposed of on site.

Based on the above information, this facility is regulated as a generator, a storage facility (S02) and a land disposal facility (D79).

The following is a summary of observed apparent violations:

- 1) 722.141a - The 1986 annual report does not include:
 - a) A description of efforts undertaken to reduce toxicity of wastes generated; and
 - b) The changes in volume and toxicity actually achieved during the year;
- 2) 703.152a2 - Failure to file an amended Part A permit application as necessary to comply with the provisions of Section 703.155;
- 3) 703.155d - A revised Part A was not submitted no later than 90 days prior to the change in operational control from Jones & Laughlin Steel Corporation in Pittsburgh, PA. to LTV Steel Company, Cleveland, OH; and
- 4) 725.153b - The contingency plan was not submitted to the local hospital.

Area	C-	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1		A, D, E, G	PART 722 GENERATOR STANDARDS Subpart A: General				
				Section 722.111 Hazardous Waste Determination	✓			
				Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			A	Section 722.112 USEPA Identification Number	✓			
			a)	Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b)	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

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GN-A-1

12

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
				<p>Part 722 GENERATOR STANDARDS</p> <p>Support B: The Manifest</p> <p>Section 722.120 Generator Requirements</p> <p>a) Has the generator who transports; or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b) For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>c) For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by and requiring completion by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.</p>	<input checked="" type="checkbox"/>			

GN-B-1

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
MAN	2		f)	<p>In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Section 722.121 Acquisition of Manifests</p>	<input checked="" type="checkbox"/>			
			a) or B)	<p>This section reiterates the requirements for generators to use Illinois manifests for hazardous waste going for treatment, storage or disposal in Illinois; or consignment State manifests for wastes going out of State for treatment, storage or disposal unless the consignment State does not supply its own manifest, in which case the generator must use the Illinois manifest. A "No" answer to the second or third question under Section 722.120, General Requirements, also indicates non-compliance with this section.</p> <p>Section 722.122 Number of Copies</p> <p>Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?</p> <p>Yes <input checked="" type="checkbox"/> No _____</p>	<input checked="" type="checkbox"/>			
MAN	2							

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GN-B-2

14

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
MAN				<p>Section 722.123 Use of the Manifest</p> <p>a) For each manifest reviewed, has the generator?</p> <p>1) Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Retained one copy as required by Section 722.140(a), Record keeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b) Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c) Has the generator followed the procedures prescribed in Section 722.123 (c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d) Has the generator followed the procedures prescribed in Section 722.123 (d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

GN-B-3

Area	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
			Part 722				
			GENERATOR STANDARDS				
		A,D, E,G	Subpart C: Pre-transport Requirements				
			Section 722.130 Packaging			✓	
OTH	1	X	Is waste which is ready for transportation off-site packaged in accordance with 49CFR, Parts 173, 178 and 179? Yes _____ No _____				
			Section 722.131 Labeling			✓	
OTH	1	X	Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49CRR Part 172? Yes _____ No _____				
			Section 722.132 Marking			✓	
OTH	1	X	a) Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49CFR Part 172? Yes _____ No _____				
			b) Is each package of hazardous waste which is ready for transportation off-site marked in accordance with:				
			- The generator's name and address? Yes _____ No _____				
			- The manifest document number associated with the container? Yes _____ No _____				

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GN-C-1

16

39

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1			<p>- The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"?</p> <p>Yes _____ No _____</p> <p>Section 722.133 Placarding</p> <p>Does the generator have, for the waste it generates, the proper placards to:</p> <p>- Placard the transport vehicle, or</p> <p>- Offer to the first transporter, according to 49CFR, Part 172, Subpart F? Yes <input checked="" type="checkbox"/> No _____</p>	<input checked="" type="checkbox"/>			
OTH	1		X	<p>Section 722.134 Accumulation Time</p> <p>Has the generator (who is not a small quantity generator in compliance with the requirements in Section 721.105) only accumulated hazardous waste on site for periods of 90 days or less?</p> <p>Yes _____ No <input checked="" type="checkbox"/></p> <p>Note: If the answer is "Yes", complete the following questions. If the answer is "No", and there is more than 1000 kg (one kg of acute hazardous waste or 100 kg of any residue or contaminated soil, waste or other debris resulting from the clean up of a spill, into or on any land or water, of any acute hazardous waste listed in Sections 721.121, 721.132 or 721.133 (e)) the firm is a storage facility. Complete the TSD inspection form, unless the generator has requested and has been granted an extension as provided for in Section 722.134 (b). Skip to 722.134 (c) on Page GN-C-4 and continue (if "No")</p>			<input checked="" type="checkbox"/>	

GN-C-2

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	2		A,D, E,G	<p>Part 722</p> <p>GENERATOR STANDARDS</p> <p>Subpart D: Record keeping and Reporting</p> <p>Section 722.140 Recordkeeping</p> <p>Has the generator retained for a period of three years:</p> <p>a) - A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b) - A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b) - A copy of each exception report? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p> <p>c) - Copies of test results, waste analyses or other determinations made in accordance with Section 722-111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d) Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140 (a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d) If the Director has requested that the records required in 722.140 (a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	2			<p>Section 722.141 Annual Reporting</p> <p>a) Has the generator who ships waste off-site prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1, for the preceeding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>		<input checked="" type="checkbox"/>		

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GN-D-1

22

Area	C	SU Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
MAN	1		a)	<p>Does the annual report include a description of:</p> <ul style="list-style-type: none"> - The efforts undertaken during the year to reduce volume and toxicity of waste generated? Yes _____ No <input checked="" type="checkbox"/> N/A _____ - The changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984? Yes _____ No <input checked="" type="checkbox"/> N/A _____ <p>Note: The above descriptions will be required on annual reports for calendar year 1986 and later.</p> <p>Note: A generator who treats, stores or disposes of hazardous waste on-site must submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.</p> <p>Section 722.124 Exception Reporting</p>				<p><i>Volume was reduced but no statement on toxicity.</i></p> <p><input checked="" type="checkbox"/></p>
			a)	<p>Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes _____ No _____</p>				

GN-D-2

23

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1			<p>b) Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the director? Yes _____ No _____</p> <p>b) Does any exception report submitted to the Director contain the following?</p> <ul style="list-style-type: none"> - A legible copy of the manifest for which the generator does not have confirmation of delivery, and - A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Section 722.143 Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director? Yes _____ No _____</p>			<input checked="" type="checkbox"/>	

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GN-D-3

24

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1		A,D, E,G	Part 722				
				GENERATOR STANDARDS				
				Subpart E: Special Conditions				
				Section 722.150 International Shipments			✓	
				b)1) Has the generator notified the Administrator and Agency, in writing, four weeks before the initial shipment of hazardous waste to each country in each calendar year? Yes ___ No ___ N/A ___ ✓				
				b)1) Does the notice include the following?				
				<ul style="list-style-type: none"> - The waste identification by its USEPA hazardous waste identification number and its DOT shipping description and, - The name and address of the foreign consignee? Yes ___ No ___ 				
				b)2) Has the generator received confirmation, in writing, from the foreign consignee that the waste had been delivered? Yes ___ No ___				
				Note: A copy of the manifest signed by the foreign consignee may be used for this purpose.				
				b)3) Has the generator met the manifest requirements of Section 722.120 except that:				
				<ul style="list-style-type: none"> - In place of the name, address, and USEPA identification number of the designated facility, the name and 				25
					GN-E-1			

Area	C-	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
				<p>address of the foreign consignee is used, and</p> <p>- The generator identifies the point of departure from the United States that the waste must travel before entering a foreign country? Yes ____ No ____</p> <p>b)4) Is the generator using manifests obtained from the Agency for its international shipments? Yes ____ No ____ N/A ____</p> <p>c)1) Has the generator filed an exception report if it has not received a signed copy of the manifest from the transporter stating the date and place of departure of the waste from the United States within 45 days of the date the waste was accepted by the transporter? Yes ____ No ____ N/A ____</p> <p>c)2) Has the generator filed an exception report if it has not received written confirmation from the foreign consignee of the arrival of the waste within 90 days of the date the waste was accepted by the initial transporter? Yes ____ No ____ N/A ____</p> <p>d) Has the person exporting hazardous waste filed with the Administrator and the Agency, no later than March 1 of each year, a report summarizing the types, quantities, frequency and ultimate destination of all such hazardous waste exported during the previous calendar year? Yes ____ No ____ N/A ____</p>				

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GN-E-2

26

Area	C.	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
			e)1)	Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that: In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used.				
			e)2)	Has the importer or his agent signed the manifest in place of the generator? Yes ___ No ___ N/A ___				
			e)2)	Has the importer or his agent obtained the signature of the initial transporter? Yes ___ No ___ N/A ___				
			f)	Is the person importing hazardous waste using manifests obtained from the Agency? Yes ___ No ___ N/A ___				
OTH	2	X		Section 772.151 Farmers Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes: - Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107 (b)(3), Residues of Hazardous Waste in Empty Containers? Yes ___ No ___ N/A ___			✓	

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1		C, E, F, G	Part 703				<p>RECEIVED</p> <p>JUN - 8 1987</p> <p>EPA-DLPC</p> <p>PER-B-1</p> <p>(NO PER-A)</p>
				RCRA PERMIT REPORT				
				Subpart B Prohibitions				
				Section 703.121 RCRA Permits				
			a)	Is any persons conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only:				
				1) With a RCRA permit for the HWM facility? Yes ___ No ___				
				2) In conformance with all conditions imposed by the RCRA permit? Yes ___ No ___				
			b)	Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes ___ No ___				
			b)	Do the owners and operators of any hazardous waste unit which closed after January 26, 1982, have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes ___ No ___ N/A ___				

Area	Cl	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1		C,E, F,G	Part 703				
				RCRA PERMIT PROGRAM				
				Subpart C Authorization by Rule and Interim Status				
				Section 703.150 Application by Existing HWM Facilities and Interim Status Qualifications	✓			
				a) Has the owner or operator of an existing HWM facility or of an HWM facility in existence on the effective date of statutory or reg- ulatory amendments that render the facility subject to the re- quirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:				
				1) Six months after the date of pub- lication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				

37
PER-C-1

Area	C	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1			<p>Section 703.152 Amended Part A Application</p> <p>Has the owner or operator of an HWM with interim status filed an amended Part A permit application with the Agency:</p> <p>a) 1) 1) No later than the effective date of revised regulations under 35 Ill. Adm. Code, 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>a) 2) 2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes ___ No <input checked="" type="checkbox"/> N/A ___</p> <p>Note: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.</p>		<input checked="" type="checkbox"/>		<p><i>A change in operators in 1984 from Jones & Langstain Steel in Pittsburgh, PA to LTU Steel in Cleveland, OH.</i></p> <p>RECEIVED JUN - 8 1987 IEPA-DLPC</p> <p>PER-C-2</p>
OTH	1			<p>Section 703.154 Prohibitions During Interim Status</p> <p>During interim status has the facility refrained from:</p> <p>a) - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No ___</p>	<input checked="" type="checkbox"/>			

Area	Ct	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1			- Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Section 703.155 Changes During Interim Status a) Note: Section 703.155 (a) (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. b) or c) d) Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Section 703.156 Interim Status Standards Is the owner or operator complying with all interim status standards of 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Note: Complete the applicable portions of the TSD inspection form prior to answering the above questions.		<input checked="" type="checkbox"/>		
					<input checked="" type="checkbox"/>			
OTH	1					<input checked="" type="checkbox"/>		* The specific areas of non-compliance are being cited individually. Therefore, this will not be cited as an apparent violation. 39 PER-C-3

Area	C.	90 Day F/U	Key Ltr Sub Sec.	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1		C, E F, G	<p>Part 725</p> <p>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</p> <p>Subpart A General Provisions</p> <p>Section 725.101 Purpose, Scope And Applicability</p> <p>d) Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101 (d)? Yes ___ No ___</p>			✓	

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TSD-A-1

40

Area	Ci	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1		C, E, F, G	Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				Subpart B General Facility Standards				
				Section 725.111 USEPA Identification Number	✓			
				Has the facility obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 725.112 Required Notices			✓	
			a)	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			b)	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period; did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 702, 703 and 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
OTH	1			Section 725.113 General Waste Analysis	✓			
				a) 1) Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-1

41

6.4

Area	Cl	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
			a)1)	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				<p>RECEIVED</p> <p>JUN - 8 1987</p> <p>EPA-DLPC</p> <p>TSD-B-2</p> <p>42</p>
				Has the analysis been repeated:				
			a)3)	A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			a)3)	B) By off-site facilities, when the results of the inspection required in Section 725.113 (a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			a)4)	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			b)	Has the owner or operator developed a written waste analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b)	Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b)	Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113 (a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Area	Ca	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
			b)	<p>Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) The test methods which will be used to test for those parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

TSD-B-3

43

Area	Ct	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
				<p>Note: Circle the specific waste management methods being employed.</p> <p>c) For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>Section 725.114 Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114 (a)? Yes ___ No <input checked="" type="checkbox"/></p> <p>b) 1) Does a non-exempt facility have either:</p> <p>1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes <input checked="" type="checkbox"/> No ___</p> <p>2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No ___</p>	<input checked="" type="checkbox"/>			
OTH	1	X						

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JUN - 8 1987

IEPA-DLPC

TSD-B-4

44

Area	C.A.	JO Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
			c)	<p>Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Note: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

45

TSD-B-5

Area	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
OTH	2		<p>Section 725.115 General Inspection Requirements</p> <p>a) Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:</p> <p>1) Release of hazardous waste or hazardous waste constituents to the environment; or</p> <p>2) A threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>a) Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b)1) Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b)2) Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b)3) Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b)4) Does the schedule specify at least the following minimum inspection frequency:</p>	<input checked="" type="checkbox"/>			<p>RECEIVED</p> <p>JUN - 8 1987</p> <p>IEPA-DLPC</p> <p>TSD-B-6</p> <p>46</p>

Area	C.	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
				<ul style="list-style-type: none"> - Daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The items and frequencies, where applicable, called for in Sections: <ul style="list-style-type: none"> - 725.274 (Containers); - <u>725.294 (Tanks);</u> - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Note: Circle the applicable section.</p> <p>c) Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c) Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d) Does the owner or operator record the results fo inspections in a log or summary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d) Does the inspection record include"</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - The name of the inspector? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 				

TSD-B-7

47

Area	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
OTH	2		- A notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
			- The date and nature of any type of corrective action? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			Section 725.116 Personnel Training				
			a)1) Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a)1) Is the training program formalized, i.e. written down? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a)2) Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a)3) Does the program cover, at a minimum:				
			A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			B) Key parameters for automatic waste feed cutoff systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			C) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			D) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				

Each operator has specific procedures to follow for each activity.

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JUN - 8 1987

EPA-DLPC

TSD-B-8

48

Area	C.	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
				E) Response to ground water contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			a)3)	Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b)	Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			c)	Has the facility conducted an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d)	Are the following documents and records being maintained at the facility: 1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-9

49

Area	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
OTH	1	X	4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous wastes management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e) Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			Key Letter A-D - GO BACK TO GN-C-4 Section 725.117 General Requirements for Ignitable, Reactive or Incompatible Wastes			<input checked="" type="checkbox"/>	
			a) Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input type="checkbox"/> No <input type="checkbox"/>				
			a) Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input type="checkbox"/> No <input type="checkbox"/>				
			a) Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input type="checkbox"/> No <input type="checkbox"/>				
			b) Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:				
			1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input type="checkbox"/> No <input type="checkbox"/>				

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JUN -8 1987

EPA-DLPC

TSD-B-10

50

Area	C	J Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
				<p>2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes ___ No ___</p> <p>3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes ___ No ___</p> <p>4) Damage the structural integrity of the device or facility containing the waste? Yes ___ No ___</p> <p>5) Through other like means threaten human health or the environment? Yes ___ No ___</p> <p>Section 725.118 Location Standards</p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes ___ No <input checked="" type="checkbox"/></p> <p>Note: A "Yes" answer is a violation of the location standard.</p>				
								<p>51</p> <p>TSD-B-II</p>

Area	C	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1	X	A D C, E, F, G	Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C Preparedness and Prevention Section 725.131 Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air - Soil, or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				Section 725.132 Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equip- ment: a) - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			

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JUN - 8 1987

IEPA-DLPC

TSD-C-1

52

Area	C	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1	X	b)	<ul style="list-style-type: none"> - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				<p>Foreman + operators carry radios. Telephones in adjoining building</p> <p>Foam equipment on Fire truck. Company has its own Fire Dept.</p> <p>→ weekly</p> <p>53</p> <p>TSD-C-2</p>
			c)	<ul style="list-style-type: none"> - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				
			d)	<ul style="list-style-type: none"> - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Note: Any "N/A" answers must be explained in the Remarks column.</p>				
				<p>Section 725.133 Testing and Maintenance of Equipment</p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <ul style="list-style-type: none"> - Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

Area	C	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1	X		<p>Note: Any "N/A" answer must be explained in the Comments.</p> <p>Section 725.134 Access To Communi- cations Or Alarm Systems</p> <p>a) Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			Hand held radios, telephones
OTH	1	X		<p>Section 725.135 Required Aisle Space</p> <p>Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	2			<p>Section 725.137 Arrangements with Local Authorities</p> <p>Has the owner or operator made or attempted to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:</p>	<input checked="" type="checkbox"/>			

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EPA-DLPC

TSD-C-3

54

Area	90 Day F/U	Key Ltr Sub-	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
		sec a) 1)	1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				On-site fire dept. There A number County Sheriff deputies are employed at LTV and are intimately familiar with facility.
		a) 2)	2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the the primary emergency authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				The only responding police agency would be Putnam County sheriff. Only Fire Dept. is on site Fire Dept.
		a) 3)	3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				<p>↓</p> <p>LTV feels that the nature of waste does not warrant agreements with these contractors.</p>
		a) 4)	4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
		b)	<p>Note: Any "N/A" answer must be explained in the comments.</p> <p>Has the owner or operator documented; in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				Nobody refused.
			Key Letter Aor D- GO BACK TO 4N-C-3				55 TSD-C-4

Area	C	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1			Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				C, E, F, G Subpart D Contingency Plan and Emergency Procedures				
				Section 725.151 Purpose and Implementation of Contingency Plan	✓			
OTH	2			a) Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface waters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				<p>RECEIVED JUN - 8 1987 IEPA-DLPC</p> <p>not combustible → Separate Fire prevention plans w/ evacuation routes for each building</p> <p>TSD-D-1 56</p>
				b) Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				Section 725.152 Content of Contingency Plan	✓			
				a) Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:				
				1) Fires. Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				2) Explosions. Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Area	C-1	90 Day F/U	Key Ltr Sub- sec c)	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
			c)	Does the plan describe the arrangements agreed to by:				<p>On site police + Fire.</p> <p>→ see 725.137.</p>
				1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				3) Contractors? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
				4) State and local emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
			d)	Does the plan list the names, addresses and phone number (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			d)	Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			d)	If more than one person is designated as an emergency coordinator is a primary coordinator identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e)	Does the Plan identify:				
				1) All emergency equipment at the facility to include a physical description of the equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e)	Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				57

TSD-D-2

Area	Cl	90 Day F/U	Key Ltr Sub-	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	2		sec f)	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				f) Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				f) Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 725.153 Copies of Contingency Plan		<input checked="" type="checkbox"/>		
OTH	2			Has a copy (and all revisions) of the contingency plan:				Plan has not been sent to the Hospital RECEIVED JUN - 8 1987 IEPA-DLPC TSD-D-3 58
				a) a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				b) b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
				Section 725.154 Amendment of Contingency Plan	<input checked="" type="checkbox"/>			
				Has the contingency plan been reviewed, and if necessary, amended whenever:				
				a) 1) Applicable regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				b) 2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

Area	JO Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
OTH	2		<p>3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>d) 4) The list of emergency coordinators changes? Yes <input checked="" type="checkbox"/> No ___</p> <p>e) 5) The list of emergency equipment changes? Yes <input checked="" type="checkbox"/> No ___</p> <p>Section 725.155 Emergency Coordinator</p> <p>Is there an emergency coordinator on site or on call at all times? Yes <input checked="" type="checkbox"/> No ___</p> <p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes <input checked="" type="checkbox"/> No ___</p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes <input checked="" type="checkbox"/> No ___</p> <p>Section 725.156 Emergency Procedures</p> <p>Has the facility had a release, fire or explosion? Yes ___ No <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1 or 2					<input checked="" type="checkbox"/>	

Area	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
			<p>Note: If the answer is "No" check N/A. If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures prescribed in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>				

Key Letter A or D: GO BACK TO PAGE
GN-C-4

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TSD-D-5

60

83

Area	J Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
OTH	1		Part 725				
			INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
		C, E, F, G	Subpart E Manifest System, Recordkeeping and Reporting				
			Section 725.171 Use of Manifest System			✓	
			Does the facility accept waste from off-site? Yes ___ No <u>✓</u>				
			Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A".				
			For each manifest reviewed, did the facility:				
		a) 1)	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes ___ No ___				
		a) 2)	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ___ No ___ N/A ___				
		a) 3)	3) Immediately give one copy of the completed manifest to the transporter? Yes ___ No ___				
		a) 4)	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes ___ No ___				

61

TSD-E-1

Area	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
		a) 5)	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes ___ No ___				
		b)	<p>Has the facility followed the procedures prescribed in 725.171 (b) for rail or water (bulk shipments) of hazardous waste? Yes ___ No ___</p> <p>Does the facility initiate shipments of hazardous waste? Yes ___ No ___</p> <p>Note: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172 Manifest Discrepancies</p> <p>Does the facility accept hazardous waste from off-site? Yes ___ No <input checked="" type="checkbox"/></p> <p>Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A".</p>			<input checked="" type="checkbox"/>	
		d)	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e. variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes ___ No ___</p>				
		d)	If the discrepancy is not resolved within 15 days after receiving the waste, has the				

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TSD-E-2

62

Area	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?		Remarks or Comment Number
				Yes	No	
OTH	2		owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes <input type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>		
			Section 725.173 Operating Record			
		a)	Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
		b)	Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
			Does the operating record contain the following information?			
		b)1)	1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
		b)1)	2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
b)2)	3) The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
b)2)	4) The quantity of each hazardous waste at each location within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
b)2)	5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>					

TSD-E-3

63

Area	90 Day F/U	Key Ltr Sub-	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
		sec b) 2)	6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
		b) 3)	7) Records and results of waste analyses and trial test performed as specified in Sections: - 725.113 (Gen. Waste Analysis) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - 725.293 (Tanks) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - 725.325 (Surface Improvements) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.352 (Waste Piles) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.373 (Land Treatment) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.441 (Incinerators) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.475 (Thermal Treatment) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - 725.502 (Chem., Phys., Bio. Treatment) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
		b) 4)	8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
		b) 5)	9) Records and results of inspections as required by Section 725.115(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

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TSD-E-4

64 8

Area	Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
			<p>Note: The above information need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>b) 6) 10. Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring) Yes ___ No ___ N/A <input checked="" type="checkbox"/> - 725.194 (G.W. Monitoring) Yes ___ No ___ N/A <input checked="" type="checkbox"/> - 725.376 (Land Treatment) Yes ___ No ___ N/A <input checked="" type="checkbox"/> - 725.378 (Land Treatment) Yes ___ No ___ N/A <input checked="" type="checkbox"/> - 725.380 (d)(1) (Land Treatment) Yes ___ No ___ N/A <input checked="" type="checkbox"/> - 725.447 (Incinerators) Yes ___ No ___ N/A <input checked="" type="checkbox"/> - 725.477 (Thermal Treatment) Yes ___ No ___ N/A <input checked="" type="checkbox"/> <p>Note: Data required under 725.194 must be kept throughout the post-closure period.</p> <p>b) 7) 11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No ___</p> <p>b) 7) 12) All post-closure cost estimates for disposal facilities required for Section 725-244? Yes ___ No <input checked="" type="checkbox"/></p>				
							65
							TSD-E-5

Area	C.	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	2			<p>Section 725.174 Availability, Retention and Disposition of Records</p> <p>a) During the inspection were all existing records, including plans, required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c) Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to:</p> <p>- The Agency? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>- The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>b) Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	2			<p>Section 725.175 Annual Report</p> <p>Has the owner or operator prepared and submitted a copy of an annual report, supplied by the Agency, to the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			

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TS D-E-6

66

89

Area	Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
OTH	1		<p>Section 725.176 Unmanifested Waste Report</p> <p>Does the facility accept hazardous waste from off-site? Yes ___ No <input checked="" type="checkbox"/></p> <p>Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A".</p> <p>Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest for shipping paper? Yes ___ No ___</p> <p>Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes ___ No ___</p> <p>Note: If the answer to both the above questions is "Yes" check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions.</p> <p>Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ___ No ___</p> <p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ___ No ___</p>			<input checked="" type="checkbox"/>	

TSD-E-7

67

Area	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
OTH	2		<p>Section 725.177 Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p> <p>a) 1) Releases, fires, explosions as specified in Section 725.156? Yes _____ No <u>N/A</u> ✓</p> <p>b) 2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes _____ No _____ N/A ✓</p> <p>c) 3) Facility closure as specified in Section 725.125? Yes <u>✓</u> No _____ N/A _____</p>	✓			

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TSD-E-8

68

Area	C.	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
CLO	1		C, E, F, G	Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				Subparts G & H Closure, Post-Closure and Financial Requirements				
				Section 725.212 Closure Plan	✓			
CLO	1		C, E, F, G	a) Is the facility closure plan available at the facility? Yes <input checked="" type="checkbox"/> NO <input type="checkbox"/>				
				c) Was the closure plan submitted to the Agency within the time frames specified below?				
				- At least 180 days before the date closure was (is) expected to begin? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
CLO	1		C, E, F, G	- No later than 15 days after issuance of a judicial decree, board order or compliance order issued and Section 3008 of RCRA to cease receiving waste or close? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				Section 725.218 Post-Closure Plan				✓
				Is the facility post-closure plan available at the facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

Area		90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
FIN	1			Section 725.242 Cost Estimate For Facility Closure Has the facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan as specified in Section 725.212? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
FIN	1			Section 725.244 Cost Estimate For Post-Closure Care Has the facility prepared a written estimate of the annual cost of post- closure monitoring and maintenance of the facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

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TSD-G/H-2

70

Area	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
			Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES A, D, C, E, F, G Subpart I Use and Management of Container				N/A
OTH	1	X	Section 725.271 Condition of Containers Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes ____ No ____ N/A ____				
OTH	1	X	Section 725.272 Compatibility of Waste with Container Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes ____ No ____				
OTH	1	X	Section 725.273 Management of Containers a) Are containers of hazardous waste always closed during storage? Yes ____ No ____				

Area	90 Day F/U	Key Ltr Sub- sec b)	Requirement	In Apparent Compliance?			Remarks or Comment Number
				Yes	No	N/A	
OTH	2		<p>Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes ___ No ___</p> <p>Section 725.274 Inspections</p> <p>Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes ___ No ___</p> <p>Note: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.</p> <p>Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.</p>				
OTH	1	X	<p>Section 725.276 Special Requirements for Ignitable or Reactive Wastes</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line? Yes ___ No ___</p>				
OTH	1	X	<p>Section 725.277 Special Requirements for Incompatible Wastes</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes ___ No ___</p>				

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TSD-I-2

72

Area	C	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1	X		Part 725				
				INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
			C, E, F, G	Subpart J Tanks				
				Section 725.292 General Operating Requirements	✓			
			a)	Is the treatment or storage of hazardous waste in tanks in compliance with Section 725.117(b) (General Requirements for Ignitable, Reactive or Incompatible Wastes) ? Yes ___ No ___ N/A ✓				
			b)	Are only hazardous wastes or treatment reagents being placed in a tank which will not cause the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life? Yes ✓ No ___				
			c)	Are uncovered tanks being operated: - With two feet of free board? Yes ___ No ___ - With a containment structure, a drainage control system or a diversion structure with a capacity that equals or exceeds the volume of the top two feet of the tank? Yes ___ No ___				
			d)	Is a tank which has a continuous feed of hazardous waste into it equipped with a means to stop this inflow? Yes ___ No ___ N/A ✓				
								73 TSD-J-1

Area	C	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1			<p>Section 725.293 Waste Analysis and Trial Tests</p> <p>Prior to using a tank to chemically treat or store a hazardous waste which is substantially different from the waste previously treated or stored in the tank, or chemically treat hazardous waste with process substantially different from any process previously used in that tank, has the owner or operator?</p> <p>b) 1) 1) Conducted waste analyses and trial treatment or storage tests to show that the treatment or storage will meet the requirements of Section 725.292 (a) and (b)? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p> <p>b) 2) 2) Obtained written documented information on similar storage or treatment of similar wastes under similar operating conditions to show that the treatment or storage will meet the requirements of Section 725.292 (a) and (b)? Yes ___ No ___ N/A <input checked="" type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	2			<p>Section 725.294 Inspections</p> <p>Is the owner or operator inspecting, where present:</p> <p>a) 1) Discharge control equipment at least once each operating day to ensure that it is in good working order? Yes <input checked="" type="checkbox"/> No ___ N/A ___</p> <p>b) 2) Data gathered from monitoring equipment at least once each operating day to ensure that the tank is being operated according to its design? Yes <input checked="" type="checkbox"/> No ___ N/A ___</p>	<input checked="" type="checkbox"/>			

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TSD-J-2

74

Area	C.	So Day F/U	Key Ltr Sub-	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
CLO	1		c)	3) The level of the waste in the tank at least once each operating day to ensure compliance with Section 725.292 (c)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			d)	4) The construction materials of the tank at least once each week to detect corrosion or leaking of fixtures or seams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e)	5) The construction materials of, and the area immediately surrounding discharge confinement structures at least weekly to detect erosion or obvious signs of leakage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				<p>Note: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc., to determine if inspections are actually being done.</p> <p>Section 725.297 Closure</p> <p>Have all hazardous wastes and hazardous waste constituents been removed from tanks, discharge control equipment and discharge confinement structures at the completion of closure? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Note: Determine compliance or non-compliance with this section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan.</p>				
								75
								TSD-J-3

Area	C.	90 Day F/U	Key Ltr Sub- sec	Requirement	In Apparent Compliance?			Remarks or Comment Number
					Yes	No	N/A	
OTH	1			<p>Section 725.298 Special Requirements for Ignitable or Reactive Wastes</p> <p>a) Have ignitable or reactive wastes been treated, rendered or mixed before or immediately after placement in a tank so that:</p> <p>1) The resulting waste mixture and dissolution of material no longer meets the definition of ignitable or reactive waste under Section 721.121 or 721.123? Yes _____ No _____ N/A _____</p> <p>2) Section 725.117(b) is complied with. Yes _____ No _____ N/A _____</p> <p>a) Is the waste stored or treated in such a way that it is protected from any material or conditions which may cause the waste to ignite or react? Yes _____ No _____ N/A _____</p> <p>a) Is ignitable or reactive waste placed in a tank that is used solely for emergencies? Yes _____ No _____ N/A _____</p> <p>b) Is the owner or operator complying with the buffer zone requirements for tanks contained in Table 1-2 through 2-6 of the NFPA "Flammable and Combustible Liquids Code" for covered tanks in which ignitable or reactive wastes are treated or stored? Yes _____ No _____ N/A _____</p> <p>Note: For each tank in which ignitable or reactive waste is treated or stored provide the following information:</p> <p>1) Tank capacity in gallons. 2) Tank diameter in feet. 3) Distance of tank from property line in feet.</p>			✓	

TSD-J-4

76

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Facility Inspection Form for Compliance
with Underground Injection Control Requirements
(Permit and Inspection Fee Form)

Facility Name: LTV Steel IEPA File Heading: Hennepin/LTV Steel
Facility Address: Hennepin Works IEPA I.D. Number: 1558010006
Hennepin, Illinois County: Putnam
61320 U.S. EPA I.D. No.: IL0000781591
Facility Contact: Paul Schlingman Inspector(s) Name: David S. Retzlaff
Title: General Superintendent, Combustion and Utilities
Well Name: Wask Pickle Liquor Well No. 1 Date of Inspection: August 13, 1986

1. Well Classification Haz. NH Time (From) 10:30am (To) 12:45pm

Class I	<u>X</u>	<u>X</u>	<u> </u>
Class II	<u> </u>	<u> </u>	<u> </u>
Class III	<u> </u>	<u> </u>	<u> </u>
Class IV	<u> </u>	<u> </u>	<u> </u>
Class V	<u> </u>	<u> </u>	<u> </u>

Comments: _____

2. Authorization*

IEPA Permit:	_____	Permit Number:	_____
Authorization By Rule:	_____	Permit Number:	_____
Emergency Permit:	_____	Permit Number:	_____
Other:	_____		

3. Operational Status

Operating:	<u> </u>
Standby:	<u>X</u>
Inoperable:	<u> </u>

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Comments: _____

* Currently operating without a permit or authorization by rule.

	Yes	No	Value
4. Recording Devices			
a. Are continuous recording devices present/operating for: (730.113(b)(2))			
1. Injection Pressure**	X		19 psig
2. Injection Flow Rate**	X		0 gpm
*3. Volume**			
4. Annulus Pressure**	X		30 psig
5. Temperature	X		*1=74°F, #2=80°F
6. pH		X	
7. Other (specify) <u>Water injection rate</u>	X		0 gpm
8. Other (specify) <u>water inj. differential pressure</u>	X		5 psig
b. Are gauges present/operating for:			
1. Injection Pressure		X	
2. Injection Flow Rate		X	
3. Volume	X		0
4. Annulus Pressure		X	
5. Temperature		X	
6. pH		X	
7. Other (Specify) <u>Water injection total flow</u>	X		0
8. Other (Specify) <u>Tank Levels</u>	X		*1=23.8', #2=0.5'
c. Are all of the above operating within permitted ranges?			
	N/A		

Comments: * Volume is determined by injection flow rate and a volume totalizer.

*Required for Class I wells

+Required for Authorization by Rule

	<u>Yes</u>	<u>No</u>	<u>Comment</u>
5. <u>Reporting Requirements</u>			
a. Are reports submitted at least quarterly to the Agency on: (730.113(c))			
1. the physical, chemical and other relevant characteristics of the injection fluids+	<u>X</u>		<u>monthly</u>
2. the monthly average, maximum and minimum values for injection pressure, flow rate and volume and annular pressure+	<u>X</u>		
3. monitor well data+	<u>N/A</u>		
b. Was the Agency notified within 24 hours of: (704.181(d))			
1. Any monitoring or other information which indicates that any contamination may cause an endangerment to a USDW+	<u>N/A</u>		
2. Any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between USDW's.+	<u>N/A</u>		

Comments: _____

	<u>Yes</u>	<u>No</u>	<u>Comment</u>
6. <u>Special Conditions</u>			
a. Are all permit special conditions being met?	<u>N/A</u>		
If no; Explain: _____			

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7. Pre-Injection Storage Facilities and Transmission Lines

a. Storage Facilities

1. Type of Storage

- A. Tanks X - Two 150,000 gallon tanks.
 B. Surface Impoundments

b. Condition of Storage Facility

	<u>Yes</u>	<u>No</u>	<u>Comment</u>
1. Is adequate freeboard being maintained?	<u>N/A</u>	<u> </u>	<u> </u>
2. Are the dikes maintained to prevent leaks?	<u>X</u>	<u> </u>	<u> </u>
3. Are the tanks maintained to prevent leaks?	<u>X</u>	<u> </u>	<u> </u>
4. Is there evidence of past leaks?	<u> </u>	<u>X</u>	<u> </u>

If so, what steps have been taken to correct and clean up the leak?

Comments:

	<u>Yes</u>	<u>No</u>	<u>Comment</u>
c. Transmission Lines			
1. Are transmission lines being maintained to prevent leaks?	<u>X</u>	<u> </u>	<u> </u>
2. Is there evidence of past leaks?	<u> </u>	<u>X</u>	<u> </u>

If so, what steps have been taken to correct and clean up the leak?

Comments:

Remarks:

I arrived at LTV Steel at 10:30 a.m. on August 13, 1986 in order to perform a Permit and Inspection Fee inspection. I met John Cooper of USEPA - Region V at the gate. John was here to conduct an oversight inspection on my RCRA-CEI which was also conducted on August 13.

We proceeded to Paul Schlingman's office to review records and documents.

We then drove to the treatment plant. The well head, transmission lines and tanks were all in order. There was no evidence of recent leakage.

The gauges and recorders were inspected and values recorded.

The last injection occurred on August 10, 1986. The first shift injected 51,500 gallons of waste pickle liquor and 3,000 gallons of water. The second shift injected 81,200 gallons of waste and 4,735 gallons of water.

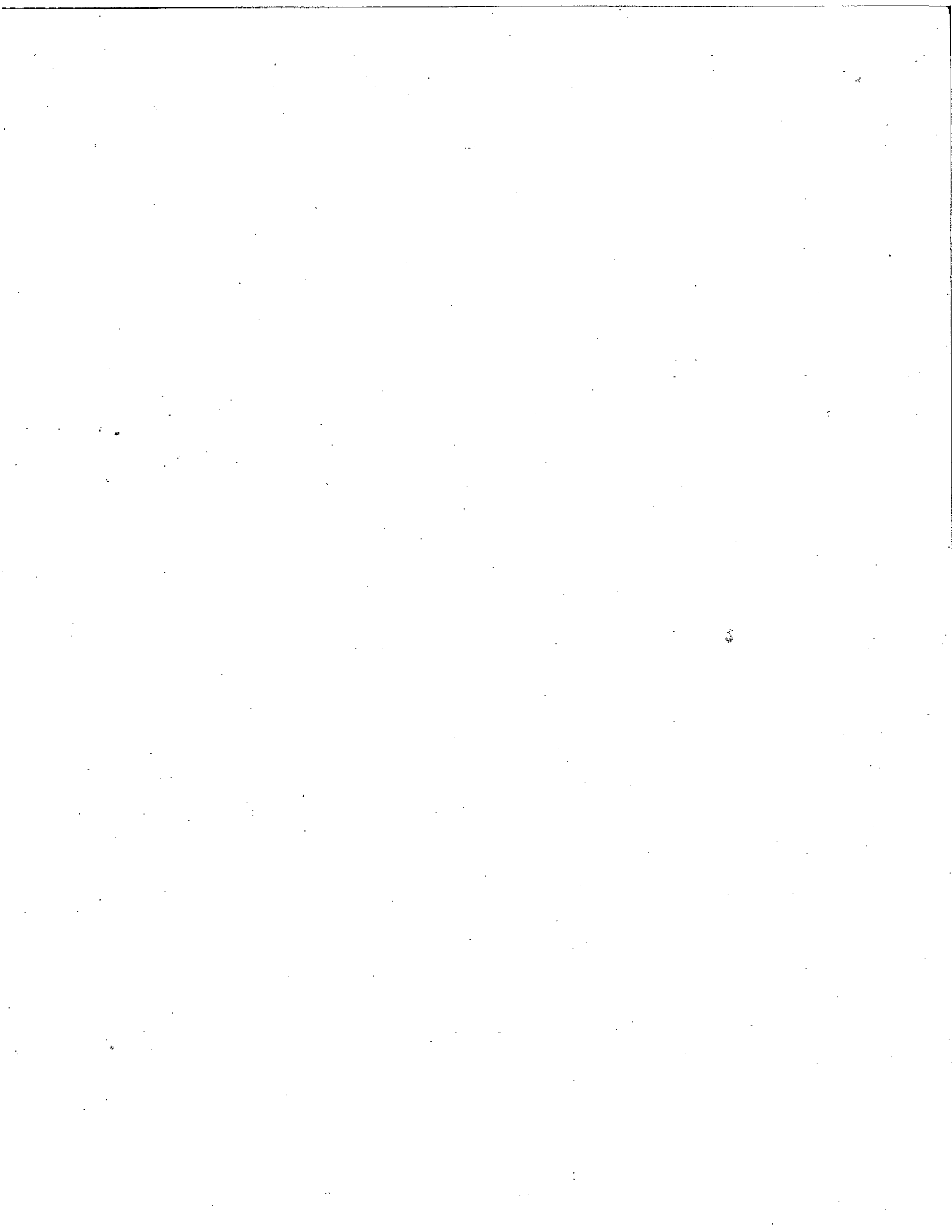
We left the site at 12:45 p.m.

TH:bls/0070E,sp

RECEIVED

AUG 20 1986

IEPA-DLPC



	Yes	No	Remarks
2) Were documents reviewed thoroughly?	<input checked="" type="checkbox"/>		
D) Facility Inspection			
1) Did the inspector observe all required items and correctly record the observations?	<input checked="" type="checkbox"/>		
2) Did the inspector ask pertinent questions regarding the processes and wastes management practices used at the facility?	<input checked="" type="checkbox"/>		
3) Did the inspector ask questions about non-regulated activities of the facility?			
4) Did the inspector identify any activities which are regulated but not on the Part A or Permit?			
E) Knowledge of the Regulations			
1) Was the inspector knowledgeable of RCRA regulations applicable to the facility?	<input checked="" type="checkbox"/>		
2) Was the inspector aware of recent amendments to the regulations that may affect the conduct of this inspection?	NA		Don't know - none discussed
3) Was the inspector able to answer questions accurately?	<input checked="" type="checkbox"/>		
4) Did the inspector commit to get answers to questions that couldn't be answered during the inspection?	NA		All answered during inspection
F) Completion of Inspection Forms			
1) Did the inspector fully complete the inspection forms during the inspection?	<input checked="" type="checkbox"/>		

ILLINOIS POLLUTION CONTROL BOARD
April 24, 1986

LTV STEEL COMPANY,

Petitioner,

v.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

Respondent.

PCB 86-43

ORDER OF THE BOARD (by J. D. Dumelle):

This matter comes before the Board upon an April 18, 1986 Motion to File Agency Record Instantly filed by the Illinois Environmental Protection Agency. The Board notes that the filing received does not actually contain such a motion, but the Board ~~construes a portion of the filing as a Motion to File the Agency~~ Record Instantly. The Motion is hereby granted.

IT IS SO ORDERED.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, hereby certify that the above Order was adopted on the 24th day of April, 1986 by a vote of 7-0.

Dorothy M. Gunn
Dorothy M. Gunn, Clerk
Illinois Pollution Control Board



Illinois Environmental Protection Agency - 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Certified #

Refer to: 1558010006 - Putnam County
Hennepin/J & L Steel
ILD000781591

U.I.C. COMPLIANCE INQUIRY LETTER

March 25, 1986

Mr. Paul Schlingman
General Superintendent, Combustion & Utilities
Jones & Laughlin Steel Corporation
Hennepin Works
Hennepin, Illinois 61320

Dear Mr. Schlingman:

~~The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code Part 704, Subpart B and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations.~~

The Agency's findings of apparent non-compliance in Attachment A are based on a March 10, 1986 review of documents submitted to the Agency to demonstrate compliance with the requirements of 35 Ill. Adm. Code Part 704, Subpart B.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations and a description of the steps which have been taken to correct the identified violations. The written response should be sent to the following:

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq.



Page 2

If you have any questions regarding the above, please contact Bur Filson at 217/782-6761.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark A. Haney".

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

MAH:GDS:ds:0667F/13-14

cc: Division File
Rockford Region
Gary King
Bur Filson
Geordie Smith



ATTACHMENT A

1. Pursuant to 35 Ill. Adm. Code 704.121, Underground Injection is prohibited except as authorized by permit or rule issued under 35 Ill. Adm. Code 704 and 705 as applicable.

Pursuant to 35 Ill. Adm. Code 704.143(c), the authorization provided in Section 704.141 shall expire if the person authorized by rule under Section 704.141 or 704.142 fails to comply with Section 704.144 or 704.148.

Pursuant to 35 Ill. Adm. Code 704.144(f), any person authorized by rule under Section 704.141 shall comply with the operating, monitoring and reporting requirements (except mechanical integrity) under 35 Ill. Adm. Code 730.113 by February 1, 1985.

Pursuant to 35 Ill. Adm. Code 730.113(a)(3), operating requirements specify that the annulus between the tubing and the long string of casings shall be filled with a fluid approved by the Agency and a pressure, also approved by the Agency, shall be maintained on the annulus unless an alternative to a packer has been approved under Section 730.112(c).

The Agency has not approved an alternative to a packer under Section 730.112(c). On December 31, 1985 the Agency disapproved the proposed alternative to a packer under Section 730.112(c) as specified in the Agency's letter on that date. You are in apparent violation of 35 Ill. Adm. Code 704.121 for the following reason: the monthly deep well disposal report submitted for January 1986 indicates that injection has taken place after the receipt of the Agency's December 31, 1985 letter.

GDS:ds:0667F/15

APPENDIX

The questions constituting this Appendix to the Facility Management Plan must be filled out prior to completion of recommendation elements of the Plan. The purpose of this appendix is to provide a summary documentation of the State and/or U.S.EPA review of available information on the subject facility. The intent is that a comprehensive file review will be conducted as the basis for selection of the recommended approach to a given facility. If the Appendix is completed by State personnel questions referring to available data reference information in State files; for Federal personnel the reference is to Federal files. Where questions refer to "all" available data or information and such material is voluminous, the response should indicate that files are voluminous, and then reference most telling information, for example groundwater contaminants found frequently or at extremely high concentrations should be specifically listed, and information most directly supporting recommended approach to facility should be described. If no information is available in facility files, the response should so indicate. It is also anticipated that this Appendix may be updated periodically as more information becomes available.

1. Description of All Available Monitoring Data for Facility:

<u>Type of Data</u>	<u>Date</u>	<u>Author</u>	<u>Summary of Results or Conclusions</u>
- No RCRA GW Monitoring Data exists for this facility. The facility is not subject to Subpart F GW Monitoring requirements.			
- Extensive data on file in regards to the monitoring of the RCRA UIC Class I injection well, i.e., Monthly Reports.			

2. Description of Enforcement Status:

<u>Type of Action</u>	<u>Date</u>	<u>Local, State or Federal</u>	<u>Result or Status</u>
- No formal enforcement action taken against this facility. Attached is a copy of the latest Compliance Inquiry letter sent to this facility concerning the permit status of their Class I UIC Well (See Attachment E-3)			

3. Description of Any Complaints from Public:

<u>Source of Complaint</u>	<u>Date</u>	<u>Recipient</u>	<u>Subject and Response</u>
Darryl Drennen - Putnam County Zoning	3/23/81	Wengrow	Unknown material being dumped by J & L Steel in abandoned gravel pit on J & L property. This site is permitted for wastewater treatment sludge disposal.

4. Description of All Inspection Reports for Facility:

<u>Date of Inspection</u>	<u>Inspector</u> (Local, State, Federal)	<u>Conclusions or Comments</u>
See Attached.		

5. During inspection of this facility did the inspector note any evidence of past disposal practices not currently regulated under RCRA such as piles of waste or rubbish, injection wells, ponds or surface impoundments that might contain waste or active, or inactive landfills?

X Yes - give date if inspection and describe observation
 10/9/80 - Wood and packaging transfer trench. Permitted by State.
 10/9/80 - Wastewater treatment sludge disposal area. Permitted by State.

 No

 Don't know

Question 4

<u>Date</u>	<u>Inspector</u>	<u>Conclusions & Comments</u>
3/14/80	MAH-IEPA	No Violations
10/9/80	Loiselle-IEPA	No Violations
4/7/81	Johnson-IEPA	No Violation - sludge Disposal
4/7/81	Johnson-IEPA	No Violations - Wood Trench
7/13/81	Holzer-IEPA	No Violations - Sludge Disposal
7/13/81	Holzer-IEPA	No Violations - Wood Trench
12/3/81	Bardo-IEPA	No Violations - U.I.C.
12/2/81	Holzer-IEPA	No Violations - Wood Trench
12/2/81	Holzer-IEPA	No Final cover on completed portion - Sludge Disposal
3/10/82	Holzer-IEPA	No Violations - U.I.C.
7/15/82	Bardo-IEPA	No Violations - U.I.C.
1/24/83	Bardo-IEPA	No Violations - U.I.C.
9/22/83	Bardo-IEPA	No Violations - U.I.C.
5/23/84	Retzlaff-IEPA	No Violation - U.I.C.
7/11/84	Munger-IEPA	ISS - Violations of 725.113, 725.152, 725.115 & 725.114
9/17/84	Retzlaff-IEPA	No Violations - U.I.C.
12/5/84	Retzlaff-IEPA	No Violations - U.I.C.
3/19/85	Retzlaff-IEPA	U.I.C. Violation of 702.150* & 730.113
6/12/85	Retzlaff-IEPA	No Violations - U.I.C.
7/23/85	Retzlaff-IEPA	No Violations - ISS
9/10/85	Retzlaff-IEPA	No Violations - U.I.C.
11/20/85	Retzlaff, Gobleman, Filson-IEPA	No Violations - U.I.C.
2/19/86	Retzlaff, Dusenbury-IEPA	No Violations - U.I.C. - PIF

t1

MAY 02 1986

6. Do inspection reports indicate observations of discolored soils or dead vegetation that might be caused by a spill, discharge or disposal of hazardous wastes or constituents?

☒ Yes - indicate date of report and describe observations
7/15/82 - Waste pickle liquor spillage from south storage tank into concrete capture tank. No evidence of material escaping tank
5/23/84 - Minor waste pickle liquor spillage on gravel near truck loading area.

☐ No

☐ Don't know

7. Do inspection reports indicate the presence of any tanks at the facility which are located below grade and could possibly leak without being noticed by visual observation?

☐ Yes - date of inspection and describe information in report

☒ No

☐ Don't know

8. Does a groundwater monitoring system exist at the facility? NO

9. If answer to question 8 is yes, is the groundwater system capable of monitoring both regulated RCRA units and other Solid Waste Management Units? _____

Explain - _____

10. Is the groundwater monitoring system in compliance with applicable RCRA groundwater monitoring standards? _____

If no, explain deficiency _____



DATE: April 30, 1986

TO: Rama Chaturvedi/Permit Section ✓

FROM: David S. Retzlaff and Robert A. Wengrow *Raw*

SUBJECT: FACILITY MANAGEMENT PLAN APPENDIX
Questions 3-7 and Summary
1558010006, 1558010005, 1558010007 - Putnam County
Hennepin/Jones & Laughlin Steel (LTV Steel)
ILD000781591

MAY 02 1986

J & L Steel's activities involve cold rolling, pickling and galvanizing of sheet steel.

There is one complaint on file. On March 23, 1981 the complainant alleged that J & L Steel was dumping an unknown material into an abandoned gravel pit on their property. The activity was permitted by the State of Illinois.

There have been numerous inspections at J & L Steel. There have been nine (9) State Inspections, eleven (11) U.I.C. Inspections and two (2) RCRA -ISS Inspections. (*since 1980*)

There are currently two activities that are not regulated under RCRA. These are: (1) ~~a wood and packaging transfer trench~~ and (2) ~~a wastewater treatment sludge disposal area~~. In addition, there is a Class I injection well on site.

There is no mention of dead vegetation in the files. There are two occasions where spills were noted. On July 15, 1982 the south storage tank failed and approximately 50,000 gallons of waste pickle liquor leaked into the cement capture tank. There is no indication that the material escaped the cement tank. The other incident was noted on May 23, 1984 when minor spillage had stained the concrete and gravel at the truck loading area.

There are no indications of the presence of underground tanks in the files. However, the waste pickle liquor transmission lines are located below grade in a cement tunnel.

DSR/tl

cc: Division File
Rockford Region
Glen Savage/FOS
Jeanette Virgilio/Permit Section

11. Describe all information on facility subsurface geology or hydrogeology available. .

	<u>Type of Information</u>	<u>Author</u>	<u>Date</u>	<u>Summary of Conclusions</u>
1.	"Feasibility Report of Subsurface Fluid Waste Disposal at the Hennepin, Illinois Mill Site for Jones & Laughlin Steel Corp." by Huntley & Huntley, Inc., dated March 16, 1966 and "Jones and Laughlin Steel Corporation Application to Drill and Operate a Disposal Well in Putnam County, Illinois" by American Industrial Disposal Systems, Inc." dated June 2, 1966 - both reports/applications contain information on the regional subsurface hydrogeology of the area (Permit No. 1966-EA-321 issued by the Illinois Sanitary Water Board was based on these reports/applications).			
2.	"Jones & Laughlin Steel, Inc./LTV Steel Co., Hennepin, Illinois, UIC Permit Application and Technical Report to Permit One Wash Acid Disposal Well" by Golden Strata Services, Inc., received by IEPA/DLPC on 12/31/84.			

- Regional Hydrogeologic Information taken from item #2 included as Attachment A-2

12. Did the facility submit a 103(c) notification pursuant to CERCLA?

 Yes Date of Notification

X No

13. If answer to 12 is yes, briefly summarize content of that notification.
(waste management units identified, type of waste concerned)

14. Has a CERCLA Preliminary Assessment/Site Investigation (PA/SI) been completed for this facility?

 Yes
X No

15. If answer to question 14 is yes, briefly describe conclusions of the PA/SI focusing on types of environmental contamination found, wastes and sources of contamination.

16. If available, having reviewed the CERCLA notification, RCRA Part A and RCRA Part B, it appears that: (CERCLA unit refers to unit or area of concern in CERCLA response activity)

 RCRA and CERCLA units are same at this facility

 X RCRA and CERCLA units are clearly different units (no CERCLA Notification on file)

 There is an overlap between the RCRA and CERCLA units
(some are the same, some are different)

17. Description of Any Past Releases or Environmental Contamination:

	<u>Type/Source of Release</u>	<u>Date</u>	<u>Material Released</u>	<u>Quantity</u>	<u>Response</u>
1.	Spill/Release into Industrial Storm Sewer System connected to effluent lagoon prior to discharge into Illinois River	4/15/77	Soluable Rolling Oil	1,000 gal.	Containment/Clean-up
2.	Spill/Release into Illinois River - due to overflow of a holding tank in WWT Plant that resulted from malfunction of an overflow alarm indicator & pH meter	5/13/77	K062 listed Haz. Pickle Liquor Waste	7,000 gal. alarm & pH meter (2,000 gal. replaced of inadequately treated pickle liquor reached river)	
3.	Spill due to storage tank piping failure	7/19/82	K062 listed Haz. Pickle Liquor Waste	50,000 gal.	containment within concrete dike surrounding storage tanks; transfer of material into adjacent tank; repair of dike lining

18. Identification of Reports or Documentation Concerning Each Release Described in Item 17.

	<u>Title/Type of Report</u>	<u>Date</u>	<u>Author</u>	<u>Recipients</u>	<u>Contents</u>
1.a.	IEPA/DWPC Emergency Report/FOS	4/15/77	J.M. Adam	IEPA/DWPC/FOS	Spill Report (Attachment A-3)
b.	Letter from J & L (response to IEPA's inquiry letter dated 4/15/77 regarding emergency spill report)	4/20/77	C.E. Baxter, J & L Steel	Harris Chien, IEPA/DWPC/FOS	Details & Conditions of spill & remedial response (Attachment A-3a)
2.	Letter from J & L Steel	5/18/77	C.E. Baxter, J & L Steel	Harris Chien, IEPA/DWPC/FOS	Details & Conditions of spill, described (Attachment A-4)
3.	IEPA FOS Inspection Report	7/15/82	Ken Bardo, IEPA	IEPA/DLPC/File	Contains information received from interview of plant manager in regards to the incident (Attachment A-5)

19. Highlight any information gaps in the file - describe any plans to obtain additional needed information.

SEE EXECUTIVE SUMMARY - ATTACHED

20. Summary of major environmental problems noted, desired solution and possible approaches.

<u>Problem</u>	<u>Solution</u>	<u>Approach</u>	<u>Pros and Cons</u>
----------------	-----------------	-----------------	----------------------

SEE ATTACHED EXECUTIVE SUMMARY

LTV Steel Company

*listed as Jones +
Laughlin*

N/A



February 26, 1986

Certified Mail-Return Receipt Requested

RCRA Activities
Region V
Post Office Box A3587
Chicago, Illinois 60690

Attention: ATKJG

Re: Jones and Laughlin Steel, Inc.
(LTV Steel Company, Inc.)
ILD 000 781 591

Disposal Facility
RECEIVED
MAR 04 1986
SOLID WASTE BRANCH
U.S. EPA REGION V

Dear Reader

Please be advised that Jones and Laughlin Steel, Inc. (now, LTV Steel Company, Inc.) is not seeking a RCRA permit for its Hennepin Works. Accordingly, we do not believe the certification appended to the undated form letter from David Stringham is applicable. It is returned herewith unsigned.

Very truly yours,

W. L. West

W. L. West
Director
Environmental Control

WLW/fh

Enclosure

1659a

Rec'd 11/16/84



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-JCK-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. EPA ID #: IL0000781591

JONES & LAUGHLIN STEEL CORP HENNEP*

BOX 325

HENNEPIN

IL 61327

RE: Hazardous Waste Permit Application

Dear Permit Applicant:

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status" (or the State program equivalent), while complying with applicable technical and record-keeping standards.

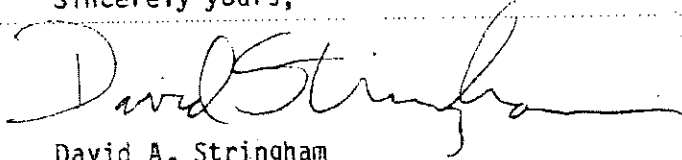
On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2 (or the State regulation equivalent).

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Please mail your response to the following:

RCRA Activities
Region V
P. O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

Sincerely yours,

A handwritten signature in cursive script, appearing to read "David Stringham", written over a horizontal dotted line.

David A. Stringham
Chief, Solid Waste Branch

Enclosure

copy 3

LTV Steel Company.

1/15/86

SEC

RKS

LTV

January 15, 1986

Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Attn: Lawrence W. Eastep, Manager
Permit Section
Division of Land Pollution Control

Re: 550010006-Putnam Co.
Hennepin/LTV Steel Company-UIC Well #1
ILD00070591

Dear Mr. Eastep:

LTV Steel is in receipt of your December 31, 1985 letter indicating disapproval of LTV's proposed alternative to a packer, expiration of "authorization by rule" and alleged violation of Section 704.143 of 35 I.A.C. You also requested submission of certain engineering plans and cost estimate for plugging and abandonment or recompletion design which would include a packer by February 1, 1986.

LTV Steel has already initiated engineering development and design. However, in order to provide proper development and engineering, LTV requests a 30-day extension to the February 1, 1986 date for submission of the requested engineering plans and data.

The ramifications of your December 31, 1985 letter are extensive and, therefore, LTV Steel requests a meeting with you on January 28, 1986 to discuss your December 31, 1985 and December 23, 1985 letters. I will call you to verify the meeting and identify the meeting time and participants. If you have any questions, please call me at (216)429-6543.

Sincerely,

D. L. Haney

D. L. Haney
Manager, Environmental Control

DLH/dh
0634b
Attachments

RECEIVED
JAN 16 1986

02
RESPONSE TO 12/24/85 CIL

LTV Steel Company

HENNEPIN WORKS



January 3, 1986

Illinois Environmental Protection Agency
Division of Land Pollution Control
Facilities Compliance Unit
Compliance Monitoring Section
2200 Churchill Road
Springfield, Illinois 62706
Attention: Mark A. Haney, Manager

RE: #1558010006-Putnam County Hennepin/J & L Steel, ILD 000781591

Dear Mr. Haney,

In response to your December 24, 1985, UIC compliance inquiry letter, the reason for the apparent violation was that we installed a new check valve in the water piping to the annulus of the well, replacing an older existing check valve that had been there since the well was originally placed in service. With the old check valve in place there was apparently enough leakage through this check valve that our pressure recording equipment continued to indicate and read the pressure that was indicated on the annulus of the deep well. By installing the new check valve, this created a seal that was tight enough to keep the annulus pressure from indicating on the recording equipment. This was inadvertent, and after we became aware of the change, the sensing line was moved to a new location on the well side of the check valve and it is now reading and recording continuously the annulus pressure of the well.

We apologize for this error and if there are any further questions, please do not hesitate to contact me.

RECEIVED
JAN 09 1986

HPADLPC

P.N. Schlingman, General Supervisor
Combustion and Utilities

/ch
UTIL4



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: Y558010006 - Putnam County
Hennepin/J & L Steel
ILD000781591

Certified # *P594 558597*

U.I.C. COMPLIANCE INQUIRY LETTER

December 24, 1985

Jones & Laughlin Steel Corporation
Attn: Mr. Paul N. Schlingman, General Super.
Combustion and Utilities
Hennepin Works
Hennepin, IL 61327

Dear Mr. Schlingman:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code Part 730, Subpart B and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations.

The Agency's findings of apparent non-compliance in Attachment A are based on a December 20, 1985 review of documents submitted to the Agency to demonstrate compliance with the requirements of 35 Ill. Adm. Code Part 730, Subpart B.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations and a description of the steps which have been taken to correct the identified violations. The written response should be sent to the following:

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq.



Page 2

If you have any questions regarding the above, please contact Bur Filson at 217/782-6761.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark A. Haney".

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

MAH:CD:st:3129e/26-27

cc: Division File ✓
Rockford Region
Steve Strauss
Dave Retzlaff
Steve Gobleman
Bur Filson
Cindy Davis



Attachment A

Pursuant to 35 Ill. Adm. Code 720.113(b)(2), monitoring requirements shall at a minimum include the installation and use of continuous recording devices to monitor injection pressure, flow rate and volume, and the pressure on the annulus between the tubing and the long string of casing. You are in apparent violation of 35 Ill. Adm. Code 730.113(b)(2) for the following reason(s): A continuous recording device for monitoring the pressure on the annulus between the tubing and the long string of casing has not been maintained. The check valve placed between the casing and monitoring device prevents continuous monitoring of the pressure on the annulus between the tubing and the long string of casing.

MAH:CD:st:3129e/28

LTV Steel Company



November 4, 1985

U. S. EPA, Region V
Waste Management Division
RCRA Enforcement Section
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED
NOV 12 1985
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
RCRA ENFORCEMENT SECTION

Subject: LTV Steel Company, Inc.
Hennepin Works
EPA I.D. ILD 000 781 591

Gentlemen:

Enclosed, per your July 13, 1985 request and in compliance with Section 213(a) of the HSWA Amendments, Section 3005(e) of the Solid Waste Disposal Act, are three copies of an executed Certification Statement specific to LTV Steel-Hennepin Works' Class I injection well. LTV Steel submitted to the Illinois Environmental Protection Agency a UIC permit application and technical report on December 31, 1984.

Sincerely,

D. L. Haney, Jr.

D. L. Haney
Manager Environmental Control

DAW/fh

Enclosure

cc: Mark A. Haney
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

1300a

CERTIFICATION STATEMENT

LTV Steel Company, Inc. is the owner/operator of Hennepin Works, ILD 000 781 591, located at State Route 71, Hennepin, Illinois 61327. As described more fully in Exhibit A hereto, I certify that the Class I Underground Injection Unit (as identified on the attached surface topography map) at this facility is in compliance with all applicable Illinois ground-water monitoring and financial responsibility requirements that are the equivalent of those set forth in 40 CFR, Part 144.

I, W.G. Wiley, Jr., Vice President Flat Rolled of LTV Steel Company, Inc., located at 25 West Prospect Avenue, Cleveland, Ohio 44101, knowingly and willfully make this true and accurate certification to the United States Environmental Protection Agency pursuant to section 3005(e) of the Hazardous and Solid Waste Disposal Act, as amended.

Date: 11/6/85

Signature: W.G. Wiley, Jr.

EXHIBIT A

1. LTV Steel has submitted to the Illinois Environmental Protection Agency a financial guarantee bond and "stand-by" trust agreement in a total amount of \$95,400, representing the estimated cost of closure and post-closure care (plugging and abandonment) as set forth in "Illinois EPA UIC Permit Application" dated December 31, 1984.

2. No ground-water monitoring wells are in place at this facility. LTV Steel has not been required by the State of Illinois under its UIC Program to install ground-water monitoring wells.



Illinois Environmental Protection Agency - 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Certified # **P594558566**

Refer to: 1558010006 - Putnam County
Hennepin/J&L
- ILD 900781591

U.I.C. COMPLIANCE INQUIRY LETTER

October 25, 1985

Jones and Laughlin Steel Corporation
Attention: P.T. Ames, Works Manager
Hennepin Works
Hennepin, Illinois 61327

Dear Mr. Ames:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code 730 and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations.

The Agency's findings of apparent non-compliance in Attachment A are based on an October 21, 1985 review of documents submitted to the Agency to demonstrate compliance with the requirements of 35 Ill. Adm. Code Part 730.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations and a description of the steps which have been taken to correct the identified violations. The written response should be sent to the following:

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq.



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

Page 2

If you have any questions regarding the above, please contact Dan Filson at 217/782-6751.

Sincerely,

Mark A. Haney
Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

MAH:jd/2307E/26

cc: Division File ✓
Rockford Region
Steve Strauss
Dan Filson
Dave Retzlaff
Jill Withers
Cindy Davis



Illinois Environmental Protection Agency • 2200 Churchill Road, Springfield, IL 62706

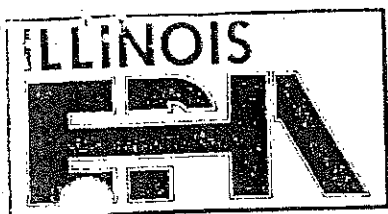
Attachment A

Pursuant to 35 Ill. Adm. Code 730.113(c)(1)(A/B), reporting requirements shall at a minimum include, quarterly reports to the Agency on:

- A) The physical, chemical and other relevant characteristics of injection fluids.
- B) Monthly average, maximum and minimum values for injection pressure, flow rate and volume, an annular pressure.

You are in apparent violation of 35 Ill. Adm. Code 730.113(c)(1)(A/B) for the following reason: you have failed to submit the Quarterly report containing the above information for the months of July, August and September of 1985.

MAH:BF:ba/2597e/16



Environmental Protection Agency
P.O. Box 915 Rockford, IL. 61103

815/987-7404

Refer To: Putnam County - 1558010006
Hennepin/J & L Steel

September 12, 1985

Mr. Paul Schlingman
General Supervisor of Combustion & Utilities
Hennepin Works
Hennepin, IL 61327

Dear Mr. Schlingman:

The purpose of this letter is to address the status of the above facility in relation to the requirements of Title 35, concerning the Underground Injection Control Program. Based on an inspection performed on ~~June 12, 1985~~ by David S. Retzlaff, representing this Agency, your facility was found to be in apparent compliance with the above regulations.

If you have any questions regarding the enclosed inspection report, please contact us at the above number.

Sincerely,

Robert A. Wengrow
Manager - Region 1 Field Operations
Division of Land Pollution Control

DSR/RAW:mlg

Enclosure

cc: Division File
Rockford Region
Bur Filson/Compliance Monitoring

RECEIVED

SEP 13 1985

EPA-DLPC